

BY ECF

767 Fifth Avenue
New York, NY 10153-0119
+1 212 310 8000 tel
+1 212 310 8007 fax

John A. Neuwirth
+1 212 310 8297
john.neuwirth@weil.com

June 25, 2021

Hon. Alison J. Nathan, U.S.D.J.
United States District Court, S.D.N.Y.
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 906
New York, NY 10007

Re: *Hawaii Structural Ironworkers Pension Trust Fund v. AMC Entm't Holdings, Inc., et al.*,
Case 1:18-cv-00299 (S.D.N.Y.) (AJN-SLC)


Dear Judge Nathan:

We represent Defendants AMC Entertainment Holdings, Inc., Adam M. Aron, Craig R. Ramsey, Chris A. Cox, Lincoln Zhang, Jack Q. Gao, Mao Jun Zeng, Anthony J. Saich, Lloyd Hill, Gary F. Locke, Howard W. Koch, Jr., and Kathleen M. Pawlus in the above-referenced action pending before Your Honor. We write on behalf of all parties, pursuant to Rule 1.D of Your Honor's Individual Practices in Civil Cases, to respectfully request an adjournment of the post-discovery status conference currently scheduled for July 2, 2021 at 3:45 p.m..

On September 23, 2020, Your Honor scheduled the post-discovery status conference for July 2, 2021 (ECF No. 172). On January 21, 2021, Your Honor granted the parties' request for an extension of the discovery deadlines, including an extension of the deadline for expert discovery, through and including July 30, 2021 (ECF No. 184), but the scheduling of the post-discovery status conference remained unchanged. On June 24, 2021, Your Honor issued an Order directing the parties to file a joint letter by June 28, 2021, four days before the post-discovery status conference, addressing four issues (ECF No. 199). The parties respectfully request that the post-discovery status conference be adjourned until after all discovery is complete, and that the deadline to file a joint letter be adjourned until four days before the new date for the post-discovery status conference. The parties have conferred and are available for a post-discovery status conference, to be held remotely, during the afternoon of August 6, 2021, August 20, 2021 (before 4 PM), or September 24, 2021. This is the parties' first request to adjourn the July 2, 2021 post-discovery status conference, and all parties consent to this request.

We are available at the Court's convenience to answer any questions Your Honor may have.

SO ORDERED.


6/28/21

The conference is adjourned to August 20, 2021 at 3:30 P.M. The joint letter is due seven days before conference.
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Weil, Gotshal & Manges LLP

Respectfully submitted,

/s/ John A. Neuwirth

John A. Neuwirth

cc: All counsel of record (by ECF)